

23-06481-MPK

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Marc Sullivan, having been duly sworn, state as follows:

INTRODUCTION AGENT BACKGROUND

1. I have been employed as a Boston police officer since June 1997. In May 2007, I was promoted to the rank of Sergeant. In March 2008, I was assigned to the Homicide Unit, where I obtained the rank of Sergeant Detective in September 2008. In June 2020, I transferred to the Human Trafficking Unit, and I currently supervise the Boston police officers in that unit. Since September 2020, I have also served as a federal task force officer assigned to the Federal Bureau of Investigation's ("FBI") Boston Human Trafficking and Child Exploitation Task Force. From May 2019 until my assignment to the Human Trafficking and Child Exploitation Task Force, I was a federal task force officer assigned to the FBI's Boston Violent Crime Task Force. As a member of my current investigative unit as well as the federal task force, I have participated in state and federal investigations related to the sexual exploitation of children and the sex trafficking of minors and adults. I have also participated in executing multiple arrest and search warrants. I have received training related to investigations involving trafficking in persons, including sex trafficking. As a federal task force officer, I am authorized to investigate violations of United States laws, including, but not limited to, violations of 18 U.S.C. § 2423(a), and to execute warrants issued under the authority of the United States.

23-06481-MPK

2. Based on my training and experience, I am familiar with the methods that sex traffickers (colloquially known as “pimps”) use to recruit, entice, transport, harbor, and arrange for victims to participate in commercial sex acts for the pimps’ financial benefit.¹

3. This affidavit is submitted in support of an application for a criminal complaint charging TRAMONTE QUEEN (hereinafter, “QUEEN”) with Transportation of a Minor with Intent to Engage in Criminal Sexual Activity, in violation of 18 U.S.C. § 2423(a).

4. As described below, there is probable cause to believe that between on or about February 1, 2022, and on or about February 5, 2022, QUEEN knowingly transported Victim 1, who was then 16 years old, from Massachusetts to Rhode Island, with the intent that Victim 1 engage in prostitution. QUEEN’s transportation of Victim 1 was part of his larger, then-ongoing sex trafficking operation, through which he also caused Victim 2, a 17-year-old girl, and Victim 3, a 16-year-old girl, to perform commercial sex acts for sex buyers in exchange for money he kept.²

5. This affidavit is based on my personal investigation and investigation by others, including law enforcement officials whom I know to be reliable and trustworthy. The facts contained herein have been obtained by conferring with witnesses, other law enforcement officers and examining evidence obtained in the course of the investigation as well as through other means. This affidavit does not include every fact known to me about this investigation, but rather only those facts sufficient to establish probable cause.

¹ In this affidavit, the term “commercial sex act” has the definition that is set forth in 18 U.S.C. § 1591(e)(3).

² The victims’ respective true names and dates of birth are known to law enforcement.

23-06481-MPK

STATEMENT OF PROBABLE CAUSE

Boston Police Stopped QUEEN with 16-year-old Victim 1 on February 5, 2022.

6. On February 5, 2022, Boston police officers who were on duty in the vicinity of Harvard Street and Waterlow Street, in the city of Boston, saw a man driving a 2011 gray Ford Fusion with a license plate that was registered to another vehicle. When the officers stopped the Ford Fusion, they identified the driver as 22-year-old TRAMONTE QUEEN. The officers identified the two passengers as 16-year-old Victim 1 and Person A, a 17-year-old male.³

7. Officers arrested QUEEN pursuant to outstanding state warrants. At the time of QUEEN's arrest, he was seated in the driver's seat of the vehicle. There were two cell phones plugged into a charger beside him on the unoccupied front passenger seat. One of the cell phones was red and the other was black. Those devices and other items were collected and transported to the police station with QUEEN. During his arrest, QUEEN became combative. While officers transported him to the police station, he kicked the rear window of the police cruiser, causing it to shatter.

8. During an inventory search of the Ford Fusion, officers observed what appeared to be firearms under both front seats. Through subsequent investigation, law enforcement determined that they were blank guns. However, officers also found a backpack in the backseat near Person A. That backpack contained another blank gun and a round of live ammunition.⁴

9. After QUEEN arrived at the police station, officers booked him into custody. At the booking desk, QUEEN's property was inventoried and placed into a property bag. His property

³ Person A's true name and date of birth are known to law enforcement.

⁴ Victim 1 and Person A were subsequently charged with Unlawful Possession of Ammunition.

23-06481-MPK

included, among other things, three cell phones and an Apple Watch.

10. On Monday, February 7, 2022, Boston police officers transported QUEEN and his property bag to the Dorchester Division of the Boston Municipal Court for his arraignment. The court ordered QUEEN held until his next court date. QUEEN then requested that his property be released to a person he described as his girlfriend. Law enforcement subsequently identified this person as 17-year-old Victim 2. However, as QUEEN was being escorted out of the courtroom following the arraignment, Victim 2 became disorderly and combative, causing court security officers to briefly detain her. Shortly thereafter, the officers released Victim 2, but she left the courthouse without retrieving QUEEN's property. Subsequently, state court judges issued a series of warrants authorizing the seizure and search of two of the three cell phones in QUEEN's property bag: a red iPhone and a black iPhone 8.

QUEEN caused Victim 1 to perform commercial sex acts in Massachusetts and Rhode Island.

11. On February 8, 2022, law enforcement officers interviewed Victim 1.⁵ In summary, she disclosed that from mid-January 2022, through February 5, 2022, QUEEN caused her to engage in commercial sex acts. Victim 1 also disclosed that QUEEN was causing Victim 2 and Victim 3 to engage in commercial sex acts. Victim 1 stated that she saw QUEEN physically abuse Victim 2, who was then pregnant with QUEEN's child.⁶

QUEEN recruited Victim 1 and began advertising her to sex buyers.

12. Victim 1 disclosed that Victim 3 introduced her to QUEEN around mid-January

⁵ The following is a summary of some of the information Victim 1 disclosed. It is not a verbatim transcript of all of Victim 1's statements regarding QUEEN.

⁶ As described in paragraph 10, QUEEN requested that his property be released to Victim 2.

23-06481-MPK

2022. Victim 1 indicated that Victim 3 told her that the reason for the introduction was to “make money.” At the time, Victim 1 did not know how QUEEN made money. However, approximately three days after Victim 1 met QUEEN, the nature of his sex trafficking operation started to become apparent when QUEEN directed Victim 1 to take photos of herself. Some of these photos depicted Victim 1 topless, and for others, QUEEN directed Victim 1 to pose in a position that QUEEN described as “bent over, arched.” Sometimes, QUEEN would take these photos of Victim 1. At the time, Victim 1 believed that QUEEN was posting the photos on the website OnlyFans.com.⁷

QUEEN directed Victim 1 to perform in-calls and out-calls, using his mother’s Dorchester house as the base for his sex trafficking operation.

13. Victim 1 disclosed that QUEEN began directing her to have sex with sex buyers. Victim 1 explained that QUEEN would tell Victim 1 that she had a “play,” which was the term that QUEEN and the victims used to describe a sex buyer or the actual commercial sex encounter with the sex buyer.⁸ QUEEN would then tell Victim 1 the basic information about the commercial sex encounter, including the price, the sex act she would need to perform, and where she would perform it. Victim 1 disclosed that QUEEN directed her to perform in-calls, which was when Victim 1 would perform the commercial sex act in the basement of QUEEN’s mother’s house in Dorchester, Massachusetts. Victim 1 also indicated that QUEEN would sometimes direct her to perform out-calls. For out-calls, QUEEN would often have the sex buyer transport the victims to

⁷ OnlyFans.com is an Internet content subscription service. The service enables users to post and members to view sexually explicit videos.

⁸ Based on my training and experience, I know that traffickers use various terms to refer to sex buyers and the acts of prostitution. In this case, “play” has a meaning similar to the term “date,” which participants in the commercial sex trade frequently use to refer to the sex buyer and/or the commercial sex encounter.

23-06481-MPK

the sex buyer's location using a rideshare application such as Uber.⁹

14. For the in-calls, Victim 1 indicated that QUEEN would arrange the commercial sex encounter, or "play," by texting with the sex buyer. When the buyer would arrive at QUEEN's mother's home, QUEEN would direct Victim 1 (or Victim 2 or Victim 3, depending on who QUEEN was directing to perform the commercial sex act) to meet the sex buyer at the door. QUEEN would hide upstairs, because, as he indicated to Victim 1, the sex buyer was not supposed to know that he was there.¹⁰ Victim 1 would tell the sex buyers that she was 19 years old. However, she believed they knew she was younger. Victim 1 would perform the requested commercial sex act, which often included vaginal intercourse and/or oral sex.

15. Victim 1 indicated that QUEEN would tell her whether she had to have sex with or without a condom. Sometimes, when Victim 1 would engage in unprotected vaginal intercourse with sex buyers, a sex buyer would ejaculate inside Victim 1. When this happened, Victim 1 asked QUEEN to provide emergency contraception, which is commonly known as "Plan B" or "the morning after pill." QUEEN would tell Victim 1 that he planned to buy the emergency contraception pill, but he never actually made it available for Victim 1.

16. Victim 1 indicated that the sex buyers would pay for the sex acts she performed by

⁹ Based on my training and experience, Victim 1's descriptions of "in-calls" and "out-calls" were consistent with how those terms are commonly used by participants in the commercial sex trade.

¹⁰ Based on my training and experience, I know that traffickers often try to conceal their involvement in the prostitution activity. Sex buyers can be reluctant to participate in the commercial sex encounter when they know a trafficker is involved. In addition, I know from my training and experience that trafficker try to stay out of sight to avoid detection by law enforcement.

23-06481-MPK

giving Victim 1 cash or sending money directly to QUEEN via his CashApp account.¹¹ QUEEN directed Victim 1 to give him the cash after she performed the commercial sex acts.

17. Victim 1 disclosed that the neighbors near QUEEN's mother's home eventually realized that there was prostitution activity occurring at the home because they notice that there were many men going in and out of the house. Victim 1 indicated that QUEEN's mother was aware of QUEEN's operation because those neighbors began to complain. As a result, QUEEN had to move his operation, so he cut off his court-ordered location monitoring device and had the victims continue performing commercial sex acts elsewhere, including in Rhode Island.

QUEEN transported Victim 1, Victim 2, and Victim 3 to Warwick, Rhode Island to engage in commercial sex at hotels.

18. Victim 1 disclosed that on several occasions between mid-January 2022 and February 5, 2022, QUEEN drove Victim 1, Victim 2, and Victim 3 to Rhode Island to engage in commercial sex at hotels. In particular, Victim 1 identified the Holiday Inn in Warwick, Rhode Island as one of the locations where QUEEN ran his sex trafficking operation. Victim 1 indicated that QUEEN wanted to go to Rhode Island because he did not want to be seen, suggesting that he enjoyed a greater degree of anonymity outside of Boston.

19. Victim 1 explained that when QUEEN transported the victims to Rhode Island, he had an adult woman (hereinafter, "Person B") travel with them to the hotels.¹² Person B would

¹¹ CashApp is an Internet-based money transfer application.

¹² Person B's true name is known to law enforcement.

23-06481-MPK

rent the hotel rooms because she had a valid state-issued identification.¹³

20. Law enforcement obtained records from the Holiday Inn Express in Warwick, Rhode Island. Those records indicate that Person B rented a room on February 4, 2022. Hotel records indicate that Person B checked into the hotel on February 4, at approximately 5:40 p.m., and checked out on February 5, 2022, at approximately 6:49 a.m.

21. Law enforcement also obtained video surveillance recordings from the Holiday Inn Express in Warwick, Rhode Island. This footage depicts QUEEN standing near the driver's side door of a gray Ford Fusion. It also depicts Victim 3 near the front passenger door and Person B near the rear passenger side door. As described in paragraph 6, on February 5, 2022, Boston police stopped QUEEN as he was driving a gray Ford Fusion with Victim 1 in the backseat. The hotel's video surveillance recordings also depict QUEEN and Victim 3 standing with Person B as she checked in at the front desk of the hotel at approximately 5:40 p.m.

QUEEN used threats and violence.

22. Victim 1 disclosed that QUEEN often possessed firearms. Later, she learned that these guns were fake. However, Victim 1 indicated that prior to learning that fact, QUEEN would hold one of the guns and tell Victim 1 that he would shoot her. Victim 1 also saw QUEEN hit and choke Victim 2.

Text messages between QUEEN and Victim 1 confirm that QUEEN was causing the victims to engage in commercial sex acts in Massachusetts and Rhode Island.

23. Law enforcement officers extracted data from Victim 1's cell phone. A review of

¹³ Based on my training and experience, I know that most hotels in the United States require one of the customers to present a valid identification indicating that the customer is over 18 years of age.

23-06481-MPK

that data revealed that Victim 1's cell phone contains extensive text messages between Victim 1 and QUEEN, in which QUEEN directed Victim 1 to engage in commercial sex acts.

24. On January 26, 2022, QUEEN directed Victim 1 to perform a "quick visit." During her interview with law enforcement, Victim 1 acknowledged that a "quick visit" is a type of commercial sex act. Based on my training and experience, I know that "quick visit" is a term used in the commercial sex trade to refer to a short commercial sex encounter. In the text exchange on January 26, QUEEN and Victim 1 discussed the following:

QUEEN: It's quick visit

QUEEN: 100

QUEEN: Get off the phone

QUEEN: Hello

Victim 1: where are the condoms

QUEEN: Downstairs in [Victim 3's] bag check [Victim 3's] bag

Victim 1: ok

QUEEN: Okay

QUEEN: Okay and ima have bro buy you ya own box

QUEEN: Tell him ya sister is here y'all are fine

Victim 1: can he come up?

Victim 1: and I did

QUEEN: Ya fine

QUEEN: Go ahead

25. On January 28, 2022, QUEEN gave Victim 1 specific directions regarding the types of sex act to perform for a sex buyer and the rates for each of those acts. In the following text

23-06481-MPK

conversation, QUEEN and Victim 1 use several terms that are common in the commercial sex trade, including: (1) “QV,” which is an abbreviation for the term “quick visit”; (2) “head,” which often refers to oral sex; (3) “bare,” which often refers to unprotected sex; and (4) “extra pop,” which often refers to a commercial sex encounter during which the sex buyer ejaculates more than once. In addition, the following text conversation includes a statement by QUEEN in which he reminds Victim 1 that the sex buyers are not supposed to know that he is controlling the victims’ prostitution activity:

QUEEN: 120 Qv

QUEEN: Head is extra

QUEEN: Bare is extra

QUEEN: 50 extra for head

QUEEN: 50 extra for bare

Victim 1: head pop and qv

QUEEN: ok extra pop is extra 25

QUEEN: And okay

QUEEN: Let me know when done

Victim 1: sooo how much

Victim 1: in total

QUEEN: 250

QUEEN: 225*

Victim 1: he said he’s just gonna do condom

QUEEN: ok

QUEEN: With head it’s 170

23-06481-MPK

Victim 1: send the cashapp to him

QUEEN: \$Ssmdrop

Victim 1: to the number

Victim 1: he's saying sent it to the number

QUEEN: You put it in

QUEEN: His phone

QUEEN: Wtf

QUEEN: He not supposed to know you wit anyone

QUEEN: That's why you supposed to do it

QUEEN: SMH

26. During another text conversation on January 28, 2022, QUEEN directed Victim 1 to return to a hotel room to meet with a sex buyer, which QUEEN referred to as a "play":

Victim 1: in the hallway

Victim 1: we went to the vending machine

Victim 1: and I forgot the numbers

QUEEN: 121

QUEEN: Tell [Victim 3]

QUEEN: Both y'll needa be answering y'all phones

QUEEN: Cause there's play [Victim 2] will be on her way
soon and do not lock that door

QUEEN: Hello

QUEEN: Hello

QUEEN: Tf

QUEEN: Y'all gonna piss me off

23-06481-MPK

Victim 1: yes

Victim 1: yes

QUEEN: Get back to the room

QUEEN: We got a issue

QUEEN: I hope you know that

Victim 1: what's wrong

QUEEN: idk but whatever y'all said or was saying
everything gets back to me

QUEEN: Just know we have a issue

QUEEN: Stop talking about me to btw

27. On January 29, 2022, QUEEN directed Victim 1 to perform commercial sex acts, again referring to the sex buyers as "plays":

QUEEN: Y'all needa get up she's 9 min away

Victim 1: im up now

Victim 1: i was tired

QUEEN: It's ok

QUEEN: I know

QUEEN: Thank you for getting up

QUEEN: Please do some plays so there's no issues ima grab
you in a few hours so relaxxx

28. During another text conversation on January 29, QUEEN told Victim 1 that he was sending her on an "out-call" to perform a commercial sex act for a sex buyer in Quincy:

QUEEN: Thank you

23-06481-MPK

QUEEN: And you have a outcall

QUEEN: In quincy

QUEEN: He ubering you

QUEEN: There and back

Victim 1: uhm

29. On February 2, 2022, QUEEN directed Victim 1 to engage in a “full service” commercial sex encounter. Based on my training and experience, I know that in the commercial sex trade the term “full service” often refers to a commercial sex encounter during which the sex buyer has the option of both vaginal and oral sex:

QUEEN: Lmk when ya wit him

QUEEN: So we know

QUEEN: It's 150

Victim 1: with him now

QUEEN: He can pay extra for bare and stuff

QUEEN: And okay

QUEEN: Make quick please

Victim 1: he giving me attitude

QUEEN: It's full service

QUEEN: So head and stuff to

QUEEN: Please try to be nice

QUEEN: Lmk when done we outside

30. On February 4, 2022, at approximately 5:19 p.m., QUEEN and Victim 1 discussed booking a hotel room, which is consistent with Holiday Inn Express records and video surveillance

23-06481-MPK

footage that demonstrate that QUEEN moved his operation to the Warwick, Rhode Island hotel that evening:

Victim 1: what's the addy of the hotel

QUEEN: We on way

QUEEN: Back now

QUEEN: We booked room

QUEEN: We coming to get y'all

QUEEN: Rn

Person B described QUEEN's interstate sex trafficking operation.

31. Person B disclosed information to law enforcement regarding QUEEN's sex trafficking operation. Person B indicated that she began spending time with QUEEN in or around November 2021. At the time, Person B believed that QUEEN was romantically involved with 17-year-old Victim 2. Several weeks later, Person B learned that QUEEN was causing underage girls, such as Victim 2 and Victim 3, to engage in prostitution.

32. Person B learned that QUEEN used the term "play" to refer to sex buyers and the commercial sex acts that his victims would perform. She described how QUEEN would have the victims perform commercial sex acts in three types of locations: in the basement of QUEEN's mother's house; at the sex buyers' homes or apartments; and in hotels. Person B indicated that she had been present at QUEEN's mother's house and hotels when QUEEN was running his operation. However, she also indicated that she would leave when the sex buyers would arrive. Person B indicated that when she was at a hotel with QUEEN and his victims, she would go to the hotel's pool or lobby to wait while QUEEN had the victims perform the commercial sex acts.

33. Person B disclosed that QUEEN paid her to rent hotel rooms for him. Person B

23-06481-MPK

also confirmed that on February 4, 2022, she, QUEEN, Victim 2, and Victim 3 stayed at the Holiday Inn in Warwick, Rhode Island.¹⁴ Person B indicated that it is possible that there was another minor female with QUEEN's operation that day. However, when Person B met with law enforcement, she could not recall that minor female's name. Nevertheless, Person B indicated that QUEEN's victims were performing commercial sex acts at the hotel.

34. Person B further disclosed that she went to at least one other hotel with QUEEN, Victim 2, Victim 3, and the other minor female. She described one incident in which she observed Victim 2, Victim 3, and the other minor female taking sexually explicit photos to be posted on prostitution advertising websites.

QUEEN attempted to obstruct justice.

35. On November 9, 2022, QUEEN was charged in Suffolk County Superior Court with various criminal offenses based on his efforts to cause Victim 1, Victim 2, and Victim 3 to engage in commercial sex acts for his financial benefit. QUEEN was held in custody at the Suffolk County Jail. While in custody, QUEEN recently used the inmate email system to direct Victim 2 to submit false information to the Suffolk County District Attorney's Office in an attempt to persuade prosecutors to dismiss the criminal charges. In the messages to Victim 2, QUEEN also directed Victim 2 to instruct Victim 3 to provide false information to the Suffolk County District Attorney's Office. He also warned Victim 2 not to reveal the fact that he had spoken to the victims. On August 28, 2023, QUEEN sent the following messages to Victim 2:

call the Suffolk superior courthouse

ask to speak to the DA assigned to tramonte queens case make sure

¹⁴ Person B indicated that the following people are depicted in the surveillance footage of the hotel's front desk: QUEEN; Person B; and Victim 2.

23-06481-MPK

to tell them everything you said when to texted her about I never touched you and that your not coming to court and that you lied and to drop the charges

after talking to her tell them to transfer you to the victim witness advocate and tell them the same thing pretty much if they ask any other questions you should know what to say if your wit [Victim 3] tell her do the same thing talk to the DA and the victim witness Advocate tell her what to say to say the same thing

and don't tell none of them me and you and [Victim 3] even spoke cause they gonna ask

CONCLUSION

36. Based on the foregoing, I respectfully submit that there is probable cause to support a criminal complaint charging TRAMONTE QUEEN with Transportation of a Minor with Intent to Engage in Criminal Sexual Activity, in violation of 18 U.S.C. § 2423(a).

/s/ Marc Sullivan

Marc Sullivan
Task Force Officer
Federal Bureau of Investigations

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by phone, on this 17th day of October 2023, at Boston, Massachusetts.



HONORABLE M. PAGE KELLEY
UNITED STATES MAGISTRATE JUDGE

